

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
2020 DEC 15 P 1:29

UNITED STATES OF AMERICA, CLERK OF COURT

Plaintiff,

v.

Case No.

20-CR-241

STACY L. CHAPPELL,

[18 U.S.C. §§ 1951(a), 924(c), and 922(g)]

Defendant.

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this Indictment, O'Reilly Auto Parts, located at 7615 W. Mill Road in Milwaukee, Wisconsin, was a business engaged in the movement of articles and commodities in interstate commerce.

2. On or about August 7, 2020, in the State and Eastern District of Wisconsin,

STACY L. CHAPPELL

did unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery in that the defendant did unlawfully take and obtain U.S. currency from employees of O'Reilly Auto Parts, against their will by means of actual and threatened force, violence, and fear of injury.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 7, 2020, in the State and Eastern District of Wisconsin,

STACY L. CHAPPELL

knowingly used, carried, and brandished a firearm during and in relation to a crime of violence,
namely robbery as charged in Count One of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this Indictment, Advanced Auto Parts, located at 4934 W. Fond Du Lac Avenue in Milwaukee, Wisconsin, was a business engaged in the movement of articles and commodities in interstate commerce.

2. On or about August 28, 2020, in the State and Eastern District of Wisconsin,

STACY L. CHAPPELL

did unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery in that the defendant did unlawfully take and obtain U.S. currency from an employee of Advanced Auto Parts, against his will by means of actual and threatened force, violence, and fear of injury.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 28, 2020, in the State and Eastern District of Wisconsin,

STACY L. CHAPPELL

knowingly used, carried, and brandished a firearm during and in relation to a crime of violence,
namely robbery as charged in Count Three of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this Indictment, Advanced Auto Parts, located 7690 W. Appleton Avenue in Milwaukee, Wisconsin, was a business engaged in the movement of articles and commodities in interstate commerce.

2. On or about September 3, 2020, in the State and Eastern District of Wisconsin,

STACY L. CHAPPELL

did attempt to unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery in that the defendant did unlawfully attempt to take and obtain U.S. currency from an employee of Advanced Auto Parts, against his will by means of actual and threatened force, violence, and fear of injury.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 3, 2020, in the State and Eastern District of Wisconsin,

STACY L. CHAPPELL

knowingly used, carried, and brandished a firearm during and in relation to a crime of violence,
namely attempted robbery as charged in Count Five of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about September 15, 2020, in the State and Eastern District of Wisconsin,

STACY L. CHAPPELL,

knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

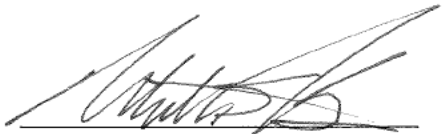
2. The firearm is more fully described as a silver and black 40 cal. Ruger SR40 semi-automatic pistol, bearing serial number 34207522.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

A TRUE BILL

FOREPERSON

Dated: December 15, 2020


MATTHEW D. KRUEGER
United States Attorney